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Attorneys for Defendant
7 *Correct Care Solutions, LLC*

8
9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
11

12 ROSEN MARIANO, An individual,
13 Plaintiff,
14 vs.

15 THE CITY OF LAS VEGAS, a political
subdivision of the State of Nevada,
16 CORRECTIONAL HEALTHCARE
COMPANIES, INC., A Foreign Corporation,
CORRECT CARE SOLUTIONS LLC, A
17 Foreign Limited Liability Company,
MICHELLE FREEMAN, Chief of Detention
18 Enforcement for the City of Las Vegas,
CORRECTION OFFICER DOE 1-10,
19 HEALTHCARE WORKER DOES 11-20,
DOES 21-99 inclusive, ROE
20 CORPORATIONS 100-199, inclusive,
21 Defendants.
22

Case No. 2:18-cv-01911-APG-GWF

**STIPULATION TO CONTINUE
DEFENDANT'S REPLY TO
PLAINTIFF'S OPPOSITION TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT [DOC 51 and
Doc 55]**

23 The parties, by and through their respective counsel of record, hereby stipulate and
24 request that this Court extend the deadline for Defendant to file their respective Reply to
25 Plaintiff's Oppositions to Defendant's Motions for Summary Judgment (Doc 51 and Doc
26 55) in the above captioned case, up to and including January 11, 2021.

27 This request for an extension of time is not sought for any improper purpose or
28 other purpose of delay.

Wherefore, the parties respectfully request that this Court extend the time for Defendant to file its Reply to Plaintiff's Oppositions to Defendant's Motion for Summary Judgment (Doc 51 and Doc 55), up to and including January 11, 2021.

DATED: December ____, 2020

DATED: December ____, 2020

THE GALLIHER LAW FIRM

LEWIS BRISBOIS BISGAARD & SMITH
LLP

/s/ Keith E. Galliher, Jr.

/s/ John M. Orr

KEITH E. GALLIHER, JR., ESQ.
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Attorneys for Correct Care Solutions, LLC

DATED: December ____, 2020

/s/ John A. Curtas

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495 S. Main Street, Sixth Floor
Las Vegas, Nevada 89101
*Attorneys for City of Las Vegas
and Michele Freeman*

IT IS SO ORDERED

DATED: December 2 ____, 2020


UNITED STATES DISTRICT JUDGE

Rokni, Roya

From: John A. Curtas <jacurtas@LasVegasNevada.GOV>
Sent: Wednesday, December 2, 2020 9:53 AM
To: Orr, John; Keith Galliher; Kathleen Gallagher
Cc: Cindy Kelly; Rokni, Roya
Subject: [EXT] RE: CCS adv Mariano__Stip to Extend Deadline for Reply

External Email

Fine with me.

John A. Curtas

Deputy City Attorney
City Attorney's Office | Civil Division
702-229-2125 (direct) | 702-528-7454 (cell)
495 South Main Street, Sixth Floor | Las Vegas, NV 89101



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From: Orr, John <John.Orr@lewisbrisbois.com>
Sent: Wednesday, December 02, 2020 9:25 AM
To: Keith Galliher <KGalliher@galliherlawfirm.com>; Kathleen Gallagher <KGallagher@galliherlawfirm.com>; John A. Curtas <jacurtas@LasVegasNevada.GOV>
Cc: Cindy Kelly <CKelly@LasVegasNevada.GOV>; Rokni, Roya <Roya.Rokni@lewisbrisbois.com>
Subject: CCS adv Mariano__Stip to Extend Deadline for Reply

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Rokni, Roya

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John M. Orr
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From: Keith Galliher <KGalliher@galliherlawfirm.com>
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Hi John: It looks fine. You may esign for me.

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Cc: Cindy Kelly <CKelly@LasVegasNevada.GOV>; Rokni, Roya <Roya.Rokni@lewisbrisbois.com>
Subject: CCS adv Mariano__Stip to Extend Deadline for Reply

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